

**COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Tidewater Regional Office**

STATEMENT OF LEGAL AND FACTUAL BASIS

Conectiv Delmarva Generation, Inc.
Tasley Peaking Station - Accomack County, Virginia
Permit No. TRO-40304
Effective Date: November 2, 2004
Expiration Date: November 1, 2009

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Conectiv Delmarva Generation, Inc. has applied for a Title V Operating Permit for its Tasley, Virginia facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____
(757) 518-2168

Date: _____

Air Permit Manager: _____

Date: _____

Deputy Regional Director: _____

Date: _____

I. FACILITY INFORMATION

Permittee

Conectiv Delmarva Generation, Inc.
P.O. Box 6066
Newark, Delaware 19714-6066

Facility

Tasley Peaking Station
Route 650, Accomack County
Tasley, Virginia

AFS ID No.: 51- 001- 00006

Source Description

SIC Code: 4911 - Electric Power Generation

The Tasley Peaking Station, operated by Conectiv Delmarva Generation, Inc., provides standby electric power generation using a Westinghouse #W-251B industrial gas turbine. The equipment was installed in June, 1972, therefore the units were deemed existing emissions units and were not subject to NSR permitting. This source was issued an initial Title V permit on November 2, 1999 for the 460 MMBtu/hr turbine and an associated #2 fuel oil-fired internal combustion startup engine rated at 4.64 MMBtu/hr. Fuel for both combustion units is stored in a 504,000-gallon tank. The facility was issued a Title V permit due to its PTE for NO_x, SO₂, PM₁₀, and CO emissions.

Compliance Status

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

II. EMISSION UNIT IDENTIFICATION

The emissions units at this facility remain:

Emission Unit ID	Stack ID	Emission Unit Description	Manufacturer and Date of Construction	Size/Rated Capacity*	Applicable Permit Date
Fuel Burning Equipment					
TA10	ST10	33 MW Combustion Turbine	Westinghouse W-251B, constructed June, 1972	460 MMBtu/hr	Nov. 2, 1999
TA20	ST20	635 HP Internal Combustion Startup Engine	Cummins V1710, installed June, 1972	4.64 MMBtu/hr	Nov. 2, 1999

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

There have been no changes to the equipment at this source since the Title V permit was last issued.

III. EMISSIONS INVENTORY

A copy of the 2003 annual emission update is attached. Emissions are summarized in the following tables.

2003 Actual Emissions

	2003 Criteria Pollutant Emissions in Tons/Year				
	VOC	CO	SO ₂	PM ₁₀	NO _x
Facility-wide Total	1.3	0.0	1.5	1.4	18.5

IV. EMISSION UNIT APPLICABLE REQUIREMENTS

There has been no change in the applicable State requirements that originally applied to this source. They remain:

- 9 VAC 5 Chapter 170, General Administration
- 9 VAC 5 Chapter 40, Existing Stationary Sources
- 9 VAC 5 Chapter 40, Part II, Article 1: Visible Emissions and Fugitive
- 9 VAC 5 Chapter 40, Part II, Article 4: General Process Operations
- 9 VAC 5 Chapter 40, Part II, Article 8: Fuel Burning Equipment Standards
- 9 VAC 5 Chapter 50, Part II, Article 1: Federal Operating Permits for Stationary Sources
- 9 VAC 5 Chapter 50, Part II, Article 4: Insignificant Activities
- 9 VAC 5 Chapter 80, Part II, Article 2: Permit Program Fees for Stationary Sources

The Title V permit was modified in May 2004 to include NO_x Budget emission limitations, as specified in 9 VAC 5-140-40 of the States regulations.

CAM Applicability

This current Title V permit requires effective periodic monitoring of the permitted equipment. The CAM Rule is not applicable to the equipment at this facility, as there is no add-on control technology used.

Limitations

Emission limits in the previous Title V permit remain unchanged. These consist of:

- Required use of low sulfur distillate (0.5% sulfur) oil in emissions units TA10 and TA20
- Visibility limits for unit TA10, based on existing source regulations
- Calculated SO₂ and PM emission limits for unit TA10, based on existing source regulations
- Calculated SO₂ emission limits for unit TA20, based on existing source regulations

Monitoring

Combustion turbine TA10 has periodic monitoring for opacity consisting of the use of EPA Method 9, combined with fulltime parametric monitoring of gas temperature telemetry, and an alarm notification system, to maintain efficient combustion and minimize the likelihood of excessive visible emissions. Startup engine TA20, due to its limited use, is not subject to opacity and monitoring requirements.

Recordkeeping and Reporting

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include fuel sulfur content records, visible emission evaluation records, records of annual operating hours (updated monthly), stack test records, maintenance records, and a spare parts inventory.

Testing

The permit does not require source testing. A table of test methods has been included in the permit should testing be performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Streamlined Requirements

There are no streamlined requirements in this Title V permit.

V. GENERAL CONDITIONS

The "General Conditions" section of this Title V permit was updated during the May 2004 modification. The General Conditions provided in DEQ's Title V boilerplates were included as appropriate. No further changes to the General Conditions section of this permit are necessary at this time.

INAPPLICABLE REQUIREMENTS

NSPS Subpart GG - does not apply to unit TA10 as the unit was built prior to October 3, 1977.

NSPS Subpart Kb - does not apply to the two oil storage tanks. TA100 has a maximum storage capacity < 10,000 gallons and TA101 was constructed prior to the subparts 1984 applicability date.

Chapter 40, Article 4 (Existing source particulate standard) - does not apply to unit TA20 as the definition of process weight excludes liquid fuels.

Chapter 40, Article 8 (Fuel burning equipment standards) - does not apply to unit TA20 as these standards do not apply to internal combustion engines.

Chapter 40, Article 37 (Tank standards) - does not apply to unit TA100 or TA101 as the vapor pressures of the contents of both tanks are below 1.5 psia, the articles applicability threshold.

The startup, shut down, and malfunction opacity exclusion listed in 9 VAC 5-40-20 A 3 cannot be included in any Title V permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedance during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedance during startup and shut down will be reviewed with enforcement discretion using the requirements of 9 VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

The following emissions units at the facility are identified in the application as insignificant emissions units under 9 VAC 5-80-720:

Emissions Unit Reference No. (URN)	Emissions Unit Description	Citation (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
TA100	#2 Distillate Fuel Oil Storage Tank	5-80-720 B.2.	VOC	504,000 gallons
TA101	Lube Oil Storage Tank	5-80-720 B.2.	VOC	1650 gallons

These emissions units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emissions units in accordance with 9 VAC 5-80-110.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V permit application are suitable for public viewing.

PUBLIC PARTICIPATION

The proposed permit will be placed on public notice in the The Eastern Shore News from August 25, 2004 to September 24, 2004.